

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ORLANDO A. ACOSTA and : DOCKET NO. 2:17-cv-01462-JHS
EDWARD LLOYD, :
PLAINTIFFS :
V. :
DEMOCRATIC CITY COMMITTEE, :
EMILIO VAZQUEZ, CARLOS MATOS, :
ELAINE TOMLIN, JEWELL WILLIAMS, :
DWANE LILLES, SHIRLEY GREGORY, :
EL-AMOR BROWNE ALI, LESLIE :
ACOSTA, MIKE TURZAI, :
PHILADELPHIA CITY COMMISSIONERS :
& COUNTY PHILADELPHIA BOARD OF :
ELECTIONS and PENNSYLVANIA :
DEPARTMENT OF STATE - BUREAU OF :
ELECTIONS, :
DEFENDANTS :

LUCINDA LITTLE, CHERI HONKALA, : DOCKET NO. 2:17-cv-01562-JHS
THE GREEN PARTY OF PENNSYLVANIA, :
REPUBLICAN CITY COMMITTEE OF :
PHILADELPHIA and REPUBLICAN :
PARTY OF PENNSYLVANIA (a/k/a) :
REPUBLICAN STATE COMMITTEE, :
PLAINTIFFS :
V. :
EMILIO VAZQUEZ, COMMISSIONER :
ANTHONY CLARK, COMMISSIONER :
AL SCHMIDT, COMMISSIONER LISA M. :
DEELEY, PEDRO CORTES, SECRETARY :
OF THE COMMONWEALTH, DEPARTMENT :
OF STATE, BUREAU OF COMMISSIONS, :
ELECTIONS AND LEGISLATION and :
PHILADELPHIA CITY DEMOCRATIC :
COMMITTEE, :
DEFENDANTS :

MOTION OF THE PLAINTIFFS, CHERI HONKALA, THE GREEN PARTY OF
PENNSYLVANIA, REPUBLICAN CITY COMMITTEE OF PHILADELPHIA AND
LUCINDA LITTLE, FOR AN EXTENSION OF FOUR (4) DAYS
TO FILE AN AMENDED COMPLAINT

The Plaintiffs, Cheri Honkala, the Green Party of Pennsylvania, Republican City Committee of Philadelphia and Lucinda Little, by and through their counsel, Samuel C. Stretton, Esquire and Linda A. Kerns, Esquire, respectfully request this Honorable Court grant an extension of four (4) days to file an Amended Complaint for the following reasons:

1. Pursuant to the Order of the Honorable Joel S. Slomsky dated January 22, 2018, the Plaintiffs are directed to file an Amended Complaint within twenty (20) days.

2. Present counsel calculates the Plaintiffs' Amended Complaint would be due on or before Monday, February 12, 2018.

3. Although the Order is dated January 22, 2018, it was not docketed until January 23, 2018, and was not received by present counsel until January 24, 2018.

4. During that time period, present counsel, Samuel C. Stretton, Esquire, was doing the final move of his law office, involving the move of thousands of files.

5. Present counsel, Samuel C. Stretton, Esquire, had had numerous hearings and trials, and has filed a number of appellate briefs.

6. Present counsel, Samuel C. Stretton, Esquire, is a sole practitioner and needs an additional four days, until Friday, February 16, 2018, to file the Amended Complaint on behalf of the Plaintiffs.

WHEREFORE, the Plaintiffs, Cheri Honkala, the Green Party of Pennsylvania, Republican City Committee of Philadelphia and Lucinda Little, by and through their counsel, Samuel C. Stretton, Esquire and Linda A. Kerns, Esquire, respectfully request this Honorable Court grant an extension of four (4) days to file an Amended Complaint for the reasons above stated.

Respectfully submitted,

s/Samuel C. Stretton

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s/Linda A. Kerns, Esquire

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DEFENDANTS :

CERTIFICATE OF SERVICE

I hereby certify I am this date serving a copy of the Motion of the Plaintiffs, Cheri Honkala, the Green Party of Pennsylvania, Republican City Committee of Philadelphia and Lucinda Little, for an Extension of Time to File the Amended Complaint in the captioned matter upon the following persons in the manner indicated below.

Service by First Class Mail addressed as follows:

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February 7, 2018

Date

Respectfully submitted,

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